

1 HONORABLE J. RICHARD CREATURA
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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 ROBERT RUSSELL, individually,

10 Plaintiff,

11 v.

12 JOSEPH SAMEC, individually; SEAN
13 BISHOP, individually; and JOHN DOES 1-10,

14 Defendants.

Case No. 2:20-cv-00263-RSM-JRC

**[PROPOSED] ORDER ON PLAINTIFF
ROBERT RUSSELL'S MOTION FOR
PRELIMINARY INJUNCTION AGAINST
DEFENDANT JOSEPH SAMEC**

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16 **NOTICE IS HEREBY GIVEN** that on June 5, 2020, the Honorable J. Richard
17 Creature, Plaintiff Robert Russell's Motion for Preliminary Injunction Against Defendant
18 Joseph Samec came on regularly for hearing.

19 On proof made to the Court's satisfaction, being satisfied that the continued
20 republication of the material attached as Exhibits 1 through 12 to the Declaration of Robert
21 Russell in support of the Motion ("Russell Declaration") presents a continuing threat of
22 imminent and irreparable harm to Plaintiff that cannot be remedied by an award of damages,
23 and for good cause appearing,

24 **IT IS HEREBY ORDERED** that Defendant Joseph Samec is enjoined and restrained
25 from continuing to publish or republishing the material attached as Exhibit 1, Exhibit 2, Exhibit
26 3, Exhibit 4, Exhibit 5, Exhibit 6, Exhibit 7, Exhibit 8, Exhibit 9, Exhibit 10, Exhibit 11 and

[PROPOSED] ORDER ON MOTION FOR PRELIMINARY INJUNCTION - 1

Case No. 2:20-cv-00263- RSM-JRC

BUCHALTER
1420 FIFTH AVENUE, SUITE 3100
SEATTLE, WA 98101-1337
TELEPHONE: 206.319.7052

1 Exhibit 12 to the Russell Declaration, including any material substantially similar to the
2 foregoing exhibits.

3 The Injunction shall remain in effect pending further Order of the Court, which reserves
4 jurisdiction to modify this injunction as the ends of justice may require.

5 IT IS SO ORDERED.

6 DATED: _____, 2020.
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8 HONORABLE J. RICHARD CREATURA
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10 Presented by:
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12 BUCHALTER
A Professional Corporation

13 By:/s/ Bradley P. Thoreson
14 Bradley P. Thoreson, WSBA #18190
Teva F. Sempel, WSBA #54896
15 1420 Fifth Avenue, Suite 3100
Seattle, WA 98101-1337
16 Telephone: 206.319.7052
Email: bthoreson@buchalter.com
17 Email: tsempel@buchalter.com

18 *Attorneys for Plaintiff Robert Russell*

CERTIFICATE OF SERVICE

I hereby certify that on May 14, 2020, I electronically filed the preceding document with the Clerk of the Court using the CM/ECF system, which will send notification to the counsel of record in this case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Marci L. Brandt
Marci L. Brandt, Legal Assistant

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